



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3

January 11, 2001

Donna Knight, Treasurer
Missouri Democratic State Committee
419 East High, P.O. Box 719
Jefferson City, MO 65102

Identification Number: C00135558

Reference: July Quarterly Report (4/1/00-6/30/00)

Dear Ms. Knight:

This letter is to inform you that as of January 10, 2001 the Commission has not received your response to our request for additional information, dated December 20, 2000. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

An adequate response must be received at the Commission by January 31, 2001. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

If you should have any questions regarding this matter, please contact Antoinette Kitchen on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Gibson", is positioned above the printed name.

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Donna Knight, Treasurer
Missouri Democratic State Committee
419 East High, P.O. Box 719
Jefferson City, MO 65102

DEC 20 2000

Identification Number: C00135558

Reference: July Quarterly Report (4/1/00-6/30/00)

Dear Ms. Knight:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line 6(a) of the Summary Page represents the total cash-on-hand as of January 1, 2000. This figure should be the same on all the reports covering the calendar year. Please amend your report to clarify the change made in Line 6(a).

-The beginning cash balance of this report should equal the ending balance of your April Quarterly Report. Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.

-The totals listed on Lines 6(c), 7, 11(c), 11(d), 21(a)(i), and 21(a)(ii), Column B of the Summary or Detailed Summary Page(s) appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. Please amend your report and any subsequent reports that may be affected by this correction.

-Your calculations for Lines 21(c), Columns A and B and 30, Column B appear to be incorrect. Please provide the corrected totals on the Detailed Summary Page.

-The Summary Page discloses \$1,814,091.12 on Line 6(c), Column B, but

MISSOURI DEMOCRATIC STATE COMMITTEE

the Detailed Summary Page shows the Line 19, Column B total to be \$1,814,396.12. These figures should be the same. Please amend your report accordingly.

-On Schedule A supporting Line 18 you disclose transfers from your non-federal account which appear to be identical to the transfers disclosed on Schedule H3. Be advised that transfers from your non-federal account should only be disclosed on Schedule H3 supporting Line 18. Please amend your report to clarify this discrepancy.

-Schedule H2 indicates the allocation ratio for DGC was revised during the reporting period. Please provide the date of the fundraising program or event. In the case of a telemarketing or direct mail campaign, the "date" is the last day of the telemarketing campaign, or the day on which the final direct mail solicitations are mailed. 11 CFR §106.5(f)(2) In the event that an excessive non-federal transfer was received, the excessive amount should be transferred back to your non-federal account.

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have not included the full name and/or mailing address for the vendor(s) listed. Please amend your report accordingly.

-Please clarify all expenditures made for "Ad Expense", "Media Placement", and "Media Purchase" on Schedule(s) H4. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B, E or F supporting Lines 23, 24 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule(s) H4 of your report to clarify the following description(s): "Communications". For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Line 21(a) of the Detailed Summary Page of your report discloses a total of \$1,356,955.53 in operating expenditures for shared federal and non-federal activity. The sum of the entries itemized on Schedule H4, however, indicates the total to be \$1,473,683.61. However, it appears that page 54 of Schedule H4 has been duplicated in your report. Please amend your report to clarify the discrepancy.

-Your EVENT YEAR-TO-DATE calculations for Administrative/Voter Drive and the event DGC are incorrect. EVENT YEAR-TO-DATE totals for administrative and voter drive costs are derived by aggregating all disbursements during the calendar year for the whole Administrative/Voter Drive category. EVENT YEAR-TO-DATE totals for fundraising, direct candidate support, and exempt activities are derived by aggregating all disbursements during the calendar year within a specific event. These should be calculated by adding the latest disbursement for a category or event to the previous EVENT YEAR-TO-DATE total for that category or event. This running EVENT YEAR-TO-DATE total should be disclosed after each disbursement is listed. Please amend your report by providing the correct EVENT YEAR-TO-DATE totals.

-You have received contributions from numerous entities, which appear to be unincorporated proprietorships or partnerships. Generally, these types of contributions are to be attributed to each person based on their percentage of ownership in the firm. Each person who has contributed in excess of \$200 since January 1 should be identified by name, address, occupation, name of employer, amount of contribution, and aggregate total on Schedule A. 11 CFR §110.1(k) Please amend your report by providing the omitted information.

-Schedule B supporting Line 29 (pertinent portion(s) attached) discloses \$4,500 in disbursements to the Democratic State Committee State Account for "Transfer to Nonfederal Account". You are advised that 11 CFR §102.5 prohibits a non-federal account from financing activity in connection with federal elections. Please provide clarifying information regarding these transactions including the date(s) when the original activity was conducted by the non-federal account. In addition, if any of the disbursements disclosed on Schedule B supporting Line 29 were made to influence the election or defeat of specific federal candidates, the disbursements should be allocated accordingly and disclosed as either in-kind contributions on Schedule B supporting Line 23, or as coordinated expenditures on Schedule F supporting Line 25. 11 CFR §§104.3(b)(3) and 106.1

Although the Commission may initiate legal action regarding the activities conducted by your non-federal account, any clarifying information that you can provide will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days

PAGE 4

MISSOURI DEMOCRATIC STATE COMMITTEE

of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

A handwritten signature in cursive script, appearing to read "A. L. Kitchen".

Antoinette Kitchen
Reports Analyst
Reports Analysis Division

271

SCHEDULE B

ITEMIZED DISBURSEMENTS

USE SEPARATE SCHEDULES
for each category of the
Detailed Summary Page

PAGE 1 OF 1
FOR LINE NUMBER 29

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee

NAME OF COMMITTEE (In Full)

Missouri Democratic State Committee

AK

| | | | |
|--|--|---------------------------------------|---|
| Full Name, Mailing Address and Zip Code Democratic State Committee State Account PO Box 719 Jefferson City, MO 65102 | Purpose of Disbursement Transfer to Nonfederal Account Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) N/A | Date (month, day, year) 04/19/2000 | Amount of Each Disbursement This Period 4,500.00 |
| Full Name, Mailing Address and Zip Code Democratic State Committee State Account PO Box 719 Jefferson City, MO 65102 | Purpose of Disbursement Transfer of NF portion of Wesfall 3/31 Cont Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) N/A | Date (month, day, year) 04/19/2000 | Amount of Each Disbursement This Period 9,000.00 |
| Full Name, Mailing Address and Zip Code | Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) | Date (month, day, year) / / | Amount of Each Disbursement This Period |
| Full Name, Mailing Address and Zip Code | Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) | Date (month, day, year) / / | Amount of Each Disbursement This Period |
| Full Name, Mailing Address and Zip Code | Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) | Date (month, day, year) / / | Amount of Each Disbursement This Period |
| Full Name, Mailing Address and Zip Code | Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) | Date (month, day, year) / / | Amount of Each Disbursement This Period |
| Full Name, Mailing Address and Zip Code | Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) | Date (month, day, year) / / | Amount of Each Disbursement This Period |
| Full Name, Mailing Address and Zip Code | Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) | Date (month, day, year) / / | Amount of Each Disbursement This Period |

SUBTOTAL of Disbursements This Page (optional)

13,500.00

TOTAL This Period (last page this line number only)

13,500.00

